

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA, §
§
Plaintiff, §
§
v. § No. CR 1:19-03333-001 WJ
§
MALCOM TORRES, §
§
Defendant. §

**Response to the government's motion in limine
for a pretrial determination of land status (Doc. 112)**

Malcolm Torres, by and through undersigned counsel, responds to the government's motion in limine for a pretrial determination of land status. (Doc. 112) Mr. Torres does not object to a pretrial determination of land status but requests a hearing on this ultimate issue of whether or not this Court has jurisdiction over the land in question. Mr. Torres does not intend to dispute that the land identified as Village Edge Road lies within the exterior boundaries of the Pueblo of Santa Clara. Mr. Torres

reserves the right to contest the government's assertion of federal jurisdiction over the property located at 1046 Arch Lane, Espanola.

Respectfully Submitted,

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/s/ Buck Glanz

/s/ Aric G. Elsenheimer

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